



April 29, 2010

Mr. Julius Genachowski
Chairman
Federal Communications Commission

Re: Puerto Rico-Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets and Definition of Radio Markets

Honorable Chairman Genachowski:

On April 8, 2010 RAAD Broadcasting officials met with the Board of Directors of the Puerto Rico Radio Broadcaster Association ("PRRBA"). The PRRBA confirmed to RAAD Broadcasting Corporation, "RAAD", that it has not endorsed any change to the Puerto Rico market definition nor has it adopted Uno Radio Group's position on the subject. In fact, it was also confirmed that the Board of the PRRBA has not had an opportunity to study the issue and the association's members have not voted on the matter. This should not come to a surprise since as stated before Uno Radio Group is, to date, the lone voice behind a new definition of Puerto Rico's radio market.

RAAD hereby respectfully submits the letter issued by Mr. Manuel Santiago Santos, President of the PRRBA, to Puerto Rico's Resident Commissioner in Washington, Honorable Pedro Pierluisi, asking him to allow the PRRBA to review the issue with its members.

In our meeting, a new level of awareness was achieved regarding the connection between the issue of market definition and its effect on the ownership rules. Furthermore, the point was made that the need for an increase in Arbitron's survey sample size to obtain more reliable regional audience data cannot come at the expense of competition by way of a self serving new definition of the market.

The letter states that the PRRBA has named a committee to study the issues related to redefining the market. The committee will study the effect of market consolidation on the industry and the likely outcome of further relaxation of the ownership rules on market dominance and competition. The letter also states that it is the interest of the PRRBA to keep the Resident Commissioner informed on these matters.

RAAD is the F.C.C. licensee of FM Broadcast Station WXYX, Bayamón, Puerto Rico, and the parent corporation for the licenses of FM Stations WXLX, Lajas, Puerto Rico and WELX, Isabela, Puerto Rico.

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The committee is presently in an information gathering process so that it can analyze the issues and propose to their Board of Directors which alternatives should be considered and how to present them at the general assembly so that the PRRBA members can vote on the matter. The next assembly is scheduled from June 11th to June 12th, however, it is not yet clear whether the issue of market definition will be in the agenda.

We respectfully ask the Commission to give room to the process started by the PRRBA. The difficult economic situation facing most of Puerto Rico's radio broadcasters as they struggle to compete in what is already a market dominated by two to three players cannot be ignored to give way to a petition that only benefits the most powerful radio broadcaster in the island.

Sincerely,



Roberto Dávila Ríos
Vice-President

Cc:

Mr. Michael J. Copps – Commissioner F.C.C.
Mr. Robert McDowell – Commissioner F.C.C.
Mr. Mignon Clyburn – Commissioner F.C.C.
Mr. Meredith Attwell Baker – Commissioner F.C.C.
Hon. Pedro Pierluisi - P.R. Resident Commissioner
Mr. Manolo Santiago - President PRRBA



19 de abril de 2010

Hon. Pedro Pierluisi
Comisionado Residente
1218 Longworth HOB
Washington, DC 20515

Honorable Comisionado Pierluisi:

Sirva la presente para agradecer el interés que siempre ha mostrado con relación a la Industria de la Radio en Puerto Rico y su apoyo en el pasado de importantes asuntos como el "Performance Tax", proyecto que afectaría adversamente las operaciones de miles de estaciones de radio en Puerto Rico y los Estados Unidos.

De igual forma, su reciente apoyo a la exclusión de Puerto Rico de la designación de un sólo mercado ante la Comisión Federal de Comunicaciones ha levantado una serie de opiniones encontradas entre algunos miembros de la Asociación de Radiodifusores de Puerto Rico.

Como presidente de dicha entidad quiero dejar establecido que la Asociación de Radiodifusores de Puerto Rico se encuentra en estos momentos atendiendo una solicitud de RAAD Broadcasting Corporation de reevaluar las actuales implicaciones relacionadas a la definición del mercado radial local en Puerto Rico.

A tales efectos, la Junta de Directores de la Asociación de Radiodifusores de Puerto Rico decidió conformar un comité que escuchará todos los ángulos pertinentes sobre el asunto y emitirá un informe que será entregado a finales del mes de abril. Dicho informe será analizado por la Junta de Directores, la que eventualmente decidirá cómo proceder con el asunto.

Nuestro interés es el de mantenerlo informado de los acontecimientos relacionados a este asunto y que conozca de los procesos que estamos llevando a cabo en la Asociación sobre este particular.

Una vez más agradecemos su incondicional apoyo a nuestra Industria y sus gestiones en beneficio de la radio puertorriqueña.

Atentamente,

Manuel Santiago Santos
Presidente